



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

KIMBER BRUNFMAN,

Defendant.

CR 2:23-cr-00185-MCS

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(C): Distribution of
Fentanyl Resulting in Death; 21
U.S.C. § 853, 28 U.S.C. § 2461(c):
Criminal Forfeiture]

The Grand Jury charges:

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

From on or about November 28, 2022 to on or about December 1, 2022, in Ventura County, within the Central District of California, and elsewhere, defendant KIMBER BRUNFMAN knowingly and intentionally distributed N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance, the use of which resulted in the death and serious bodily injury of victim A.Z.

FORFEITURE ALLEGATION

[21 U.S.C. § 853; 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c), in the event of defendant's conviction of the offense set forth in this Indictment.

2. Defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which defendant obtained, directly or indirectly, from such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used in any manner or part, to commit, or to facilitate the commission of such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond

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1 the jurisdiction of the court; (d) has been substantially diminished
2 in value; or (e) has been commingled with other property that cannot
3 be divided without difficulty.

4 A TRUE BILL

5
6 /s/
7 _____
Foreperson

8 E. MARTIN ESTRADA
9 United States Attorney

10 MACK E. JENKINS
11 Assistant United States Attorney
Chief, Criminal Division

12 
13

14 SCOTT M. GARRINGER
15 Assistant United States Attorney
Deputy Chief, Criminal Division

16 IAN YANNIELLO
17 Assistant United States Attorney
Deputy Chief, General Crimes
Section

18 LAURA A. ALEXANDER
19 Assistant United States Attorney
General Crimes Section